

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 23-cr-80140-RLR**

**UNITED STATES OF AMERICA,**

**v.**

**VICTOR VAN VICKERY,**

**Defendant.**

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**UNOPPOSED MOTION TO UNSEAL PLEA AGREEMENT, FACTUAL BASIS,  
AND CHANGE OF PLEA HEARING**

The United States of America, by and through undersigned counsel, hereby moves for an order from the Court to unseal the Defendant's plea agreement, factual basis, and change of plea proceedings. At the time of the Defendant's change of plea hearing, the Government and the Defendant requested that the Court seal these materials because there was a risk that publicly filing these materials could jeopardize the Defendant's cooperation in an ongoing matter. The Government has determined that this risk is no longer present and therefore requests that the Court unseal the documents. The Government has conferred with counsel for the Defendant, who has no objection to this motion.

(Continued on next page.)

Dated: February 7, 2024

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

GLENN S. LEON  
U.S. DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION, FRAUD SECTION

By: /s/ Andrea Savdie  
ANDREA SAVDIE  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that, on February 7, 2024, I electronically filed the foregoing document onto the Court's CM/ECF system.

/s/ Andrea Savdie  
Trial Attorney  
U.S. Department of Justice